

FIVE YEAR STATE PLAN COMMENTS

TEACHERS

1. Substitute—A teacher with a valid MO Teaching Certificate should be allowed to substitute in an ABE class until they can be ABE certified or until a suitable ABE certified teacher can be employed. The state's current policy only allows an individual with a Missouri Teaching Certificate to substitute for 18 hours. Response: Studies show that a high percent of adult students are lost in the first few hours of class. Teachers fully trained to work with adults are needed to retain these adult students in class. The writer noted unusual circumstances for which the state will review special requests on a case-by-case basis.
2. Teachers should have training in screening for disabilities, not evaluation. Evaluation implies greater training. RESPONSE: The state plan makes provision for training of teachers in identifying and screening students who may have learning disabilities. ABE teachers are not expected to evaluate students with learning disabilities.
3. Teachers should not have to jump additional hurdles to obtain additional funding. There should not be any obstacles to receive maximum funds available to the provider. RESPONSE: Rewards were added to encourage teachers to expand services to students as required by the Act. This measure is intended to promote excellence.

DATA

1. Keep correction's figures separate from public education so as not to skew the numbers in determining state performance. RESPONSE: Since corrections is funded with ABE funds their results must be included in the total performance statistics.
2. Target population should be lowered to 3% instead of 5%. RESPONSE: Programs currently reach over 4% of the target population. The act requires that the program expand service and a less than 1% increase is not unreasonable.
3. Find a way to record all information currently collected on a disk and send the disk to DESE. RESPONSE: New ways of collecting data are continually being discussed. We will be reviewing various options over the next year. At the present time the current methods are the most accurate and practical.

TESTING

1. Use the CASAS (Comprehensive Adult Student Assessment System) and ACT's Work Keys systems so as to include criterion-based assessments. These would also provide a transcript which is meaningful to future employers. RESPONSE: The plan does not specify any specific tests only that tests used be standardized.
2. 5.3 #7 should read "Pre and post tests will be at a minimum in areas of reading, and/or math, and /or English language skills". RESPONSE: Any one test in any subject area meets the pre test and/or post test requirement.

FUNDING

1. 6.7 b&c—Training funds: should be available for all teachers regardless of previous year's performance. RESPONSE: Training funds are available to all teachers. Special additional funds are available to teachers who exceed minimum performance standards.
2. Funds should be made available for "rent line items". RESPONSE: Limited ABE funds are available. If rent was allowed, services to students would be reduced.
3. Funding should not be tied to any kind of subjective measures. RESPONSE: The Act holds the state accountable. Therefore local programs will need to be held accountable. The plan provides for objective measures not subjective measures.
4. Change funding format to one that quantifies the provider's vision, viability and experiences. RESPONSE: The state's funding method is designed to maximize performance, but not at the expense of vision, viability, and experience. All of those play a role in an effective program and would be addressed in the local applicants plan.
5. The state received 3 comments on changing funding from contact hours to a "block grant" approach. RESPONSE: Earlier in the year the state sought comments from local program regarding the continuation of the current contact hour reimbursement method, a large majority of the responses supported maintaining the current funding method.
6. Allow use of expansion funds for administration costs also. RESPONSE: Expansion funds are for the purpose of expanding classes that have been identified with existing administrative funds. If we were to allow additional administrative expenditures with expansion funds, we would need to reduce administrative expenditures when programs generated fewer than anticipated contact hours.

STUDENTS

1. The state received 2 comments regarding the student follow-up requirements.
RESPONSE: We are working with the University of Missouri to conduct the follow-up on employment and postsecondary education. We would anticipate that this interaction will relieve local programs of some of the follow-up responsibilities.
2. Specific Performance 5.3 #4 change to attending 12 hours or more will increase one grade level or more..... RESPONSE: This is no longer an issue since it is now addressed in cord indicator #1 in the State Plan.
3. Welfare To Work demands work first. We need some sort of I.E.P. which would include education. RESPONSE: This needs to be worked out between the local ABE program and the DFS case manager.
4. When low level achievers have reached their maximum level how can they be counted as achieved maximum competency? RESPONSE: If this is their goal, when it is reached, they should be counted as reaching their maximum and documentation should be maintained in their file.

Develop programs tailored to clients' goals and motivation. RESPONSE: This is the objective of the state plan within the limits of the act.

PERFORMANCE

1. Specific performance measure: increase enrollment by 1% each year might be hard for a program who had a large lay-off or plant closing the year before. Consideration for this situation should be given. RESPONSE: This would be an unusual circumstance and consideration would be given to any program which might come under this or any other unforeseen circumstance.
2. The state received 3 comments on the identification of outcomes other than those identified in the Act and in the State Plan, including customer satisfaction.
RESPONSE: The plan now incorporates an option for locally developed performance measures. Local applicants may want to identify these outcomes as needed. Many local programs conduct outcome surveys now. We will encourage all programs to be customer focused. We anticipate that as local programs make connections to One-Stops and Workforce Development programs, ABE services will be incorporated in surveys of those activities.
3. Establish internal and external validity of specific performance standards, including meaningful ways to separate good practice from poor in order to stimulate program improvement and development. RESPONSE: Evaluation for the sake of improvement is established at the local level and the state level.

4. One core indicator which might be added is to show improvement in the Life Skills area for those who are not capable of any other type of learning process.

RESPONSE: This could be a locally derived performance measure which the program could measure and monitor. This is not a core performance measure specified by the Act.

DISABILITIES

1. Program strategies with disabilities should indicate the instructional leader should have training in screening for disabilities, not evaluation. The word evaluation implies greater training and education than what will be needed. RESPONSE: We concur our intentions are for the instructional leader to be able to identify and screen students with disabilities. The plan language has been changed accordingly. Plans are in place to provide training to local programs to assist them in working with disabled students.

GENERAL

1. Plan appears to focus primarily on only one of three purposes in the Act. Concern about the impact on Family Literacy programs. RESPONSE: Family literacy is one of the main thrusts of the state plan. Since the plan focuses on the lower end of literacy. The local application requires applicants to survey and address all areas of the Act including Family Literacy.

2. No incentive for on going support for those who have reached their educational and literacy levels to function as employees and citizens. RESPONSE: The federal law ENCOURAGES COLLABORATION WITH OTHER PROGRAMS IDENTIFIED IN THE ACT. We have emphasized the need for local applicants to partner with a variety of community organizations, including Workforce Development agencies.

3. In areas where population is relatively unchanging there are limited numbers of realistic candidates for the GED. If all of these people are reached and educated, the success of the program may reflect declining numbers and therefore the program could be eliminated because of success. RESPONSE: Core indicators are not limited to GED completion alone. Since we currently serve less than 5% of the target population the need is still great in all areas of the state.

4. Federal law requires certain core performance measures be met and expanded and this plan does meet the requirements. RESPONSE: All 3 core indicators that are required under the Act are addressed.

5. Some focus should be put on the poverty stricken female leader of the home. RESPONSE: This person is one of the "most in need", and part of the target group listed in the state plan and local application process.

6. Establish additional core indicators which will support client driven programs.
RESPONSE: The core indicators are specified in the act. The plan provides for additional performance measures.
7. Submit a one year transitional plan with the comprehensive plan for the next 4 years.
RESPONSE: The track record of the ABE program in the State of Missouri speaks for itself and the new state plan is only an improvement of the current plan with new federal requirements being met. Policies and regulations for the state plan have been published by the Federal Government. To develop a one year transitional plan would only be confusing to local programs and cause extra paper work.
8. Multiple providers could be catastrophic. RESPONSE: The plan provides for multiple providers only in the large target population areas of the state. This allows for direct and equal access to funds.
9. Plan focuses almost exclusively on the purpose of assisting adults in the completion of a secondary education. RESPONSE: The plan focuses on Family Literacy, ESL, and Workplace development. GED and high school completion is only one component of the plan.
10. There was no mention of an RFP being distributed at the public hearings. Therefore DESE should circulate information on how to obtain an RFP. RESPONSE: The news release of March 15, 1999 stated interested persons should contact the state office. Phone numbers and addresses were also printed in this release. Public notices will also be provided. The State Plan in section 6.4 identifies who will be informed of RFP notices.
11. The Plan does not adequately address family literacy services for low-income, low literate Missourians. RESPONSE: The state plan and the federal plan target those who are most in need which are the low-income, low literate clientele!
12. Describe how DESE will settle: disputes, dividing up the territory, how to inform potential clients so they can find services, and mechanisms used for appeal.
RESPONSE: In areas where multiple providers operate there is no designation of operation boundaries.
13. Input for developing professional programs. RESPONSE: Staff development programs funded by ABE have always asked for input from professional staff and will continue to do so.
14. One individual sought clarification of the fact that independent Adult Education and Literacy programs that do not receive funding through DESE or Federal Programs

will not be directly affected. RESPONSE: Independent programs operating on other than state and federal funds are not impacted by the plan.

SUPPORTING PLAN ELEMENTS COMMENTS

1. Believe the plan reasonably reflects the requirements set forth in the act.
2. The plan attempts to outline performance measures that can be accomplished and will encourage the growth and enhancement of services to undereducated adults in the State of Missouri.
3. The state plan allows for subjective measures; however, they are not required as performance measures. Funding should not be tied to any kind of subjective measures.
4. The state plan provides for the local program to determine the needs of the local community and then allocates program resources for a broad spectrum of Adult Education purposes such as Workforce Literacy, Family Literacy, GED preparation, adults with special needs, adults with very low literacy and adults who need English as a Second Language training.
5. The proposed state plan meets and/or exceeds the core indicators and allows these programs the flexibility to unitize funds.
6. Section 3.2, Use of Funds, is important to a strong ABE program without diluting funds for other purposes unless no other funds are available.
7. Section 4.6, Annual Evaluations, will create some burden on programs but it is believed it also can provide some helpful information to them.
8. Section 6.7 (b), Incentive Funds for Teachers, is a good idea. Good teachers will like this.
9. Section 8.0, Description of Program Strategies, which introduces GED on TV will be a great benefit to individuals who live in rural communities and who have limited transportation or child care. This can be a boon to rural Missouri.
10. Section 10.0, Equal Access to Funds, supports this.
11. Overall the plan appears rigorous yet achievable. All involved should be commended for the good job they have done.

12. Programs must be objective, quantifiable, and measurable. This plan calls for all of these.